



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service  
Food and Drug Administration

11/25/98

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

19900 MacArthur Blvd., Ste 300  
Irvine, California 92612-2445  
Telephone (949) 798-7600

**WARNING LETTER**

November 23, 1998

William Snuffer, Owner  
Sun Belt Trading Inc.  
5001 E. Washington Street  
Phoenix, AZ 85034

WL-11-9

Dear Mr. Snuffer:

During a recent inspection and investigation of your firm, our investigator confirmed that you have sold shipments of ammoniated cottonseed which have been introduced into interstate commerce.

Ammoniated cottonseed is adulterated within the meaning of Section 402(a)(2)(C)(i) of the Federal Food, Drug and Cosmetic Act ("Act"), in that ammonia is a food additive which is unsafe within the meaning of Section 409 of the Act.

Ammoniation of whole cottonseed for any purpose has not been approved by FDA.

It is your responsibility to assure that your operations are in compliance with the law. As a broker of feed ingredients, you are frequently the individual who introduces or offers for introduction into interstate commerce feeds and/or feed ingredients. As such, you share the responsibility for violation of the Act when such products are adulterated. To avoid future violations you should take precautions such as:

1. Implementing a system to identify those loads of cottonseed that have been ammoniated.
2. Implementing a system to assure ammoniated cottonseed is not transported across a state line.

You should be aware that it is not necessary for you to have personally shipped ammoniated cottonseed in interstate commerce to be responsible for a violation of the Act. The fact that you offered for sale cottonseed that has been ammoniated to a firm or individual that ships in interstate commerce is sufficient to hold you responsible for a violation of the Act.

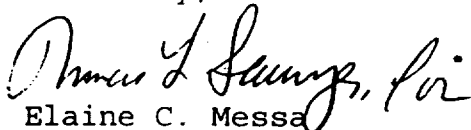
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This letter notifies you of our findings and provides you an opportunity to discontinue the interstate shipment of ammoniated cottonseed. We are aware that you have continued to sell shipments of ammoniated cottonseed which are entering interstate commerce. Such activity may result in regulatory action without further notice. This may include seizure and/or injunction.

You should notify this office in writing, within fifteen (15) working days of the receipt of this letter of the steps you have taken to bring your firm into compliance with the law. Your reply should be addressed to:

Barbara J. Rincon  
Investigator  
U.S. Food and Drug Administration  
19900 MacArthur Boulevard, Suite 300  
Irvine, CA 92612

Sincerely,



Elaine C. Messa  
District Director

cc: Sheldon R. Jones  
Director  
Arizona Department of Agriculture  
1688 West Adams Street  
Phoenix, Arizona 85007